

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of

THE COMMONWEALTH OF PUERTO RICO, et
al.,

Debtor¹

PROMESA Title III

No. 17 BK 3283-LTS
(Jointly Administered)

In re: THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of

THE EMPLOYEES RETIREMENT SYSTEM OF
THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO (ERS)

Debtor

PROMESA Title III

No. 17 BK 03566-LTS

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of

PUERTO RICO ELECTRIC POWER
AUTHORITY (“PREPA”)

Debtor

PROMESA Title III

No. 17 BK-4780-LTS

SUPPLEMENTAL VERIFIED STATEMENT PURSUANT TO RULE 2019

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) made applicable to these Title III cases by section 310 of the Puerto Rico Oversight,

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780 (LTS)) (Last Four Digits of Federal Tax ID: 9686). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Management and Economic Stability Act of 2016 (“PROMESA”),² Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica (“SREAEE”), Unión de Trabajadores de la Industria Eléctrica y Riego (“UTIER”), Asociación de Profesoras y Profesores del Recinto Universitario de Mayagüez (“APRUM”), Hermandad de Empleados del Fondo del Seguro del Estado, Inc., also known as Unión de Empleados de la Corporación del Fondo del Seguro del Estado, (“UECFSE” for its acronym in Spanish), Asociación de Empleados Gerenciales del Fondo del Seguro del Estado Corp. (“AEGFSE” for its acronym in Spanish), and Unión de Médicos de la Corporación del Fondo del Seguro del Estado Corp. (“UMCFSE” for its acronym in Spanish), by and through their undersigned counsels, hereby submit this supplemental verified statement (the “Supplemental Verified Statement”), and respectfully state as follows:

1. On March 12, 2018, APRUM, SREAEE and UTIER filed a *Verified Statement Pursuant to Rule 2019*. [Docket No. 2703].

2. On May 30, 2018, Bufete Emmanuelli filed its notice of appearance on behalf of UECFSE, AEGFSE and UMCSE.

3. UECFSE, AEGFSE and UMCSE, as well as the individuals they represent hold contingent and non-contingent claims, currently liquidated and not liquidated, in amounts not yet been determined definitively, based on (a) pay, benefits and other terms of employment claimed in pre-petition union grievances and arbitrations and (b) pay, benefits and other terms of employment denied employees as a result of pre-petition legislative, executive or other unilateral action by the Commonwealth and/or its instrumentalities; and (c) pension and other postemployment benefits accrued as a result of their employment with the Commonwealth and/or its instrumentalities.

² References to PROMESA are references to 48 U.S.C. §§ 2101 et. seq.

4. Neither UECFSE, AEGFSE nor UCMFSE, hold bonds issued by the Commonwealth or its instrumentalities.

5. By filing this Supplemental Verified Statement, UECFSE, AEGFSE and UCMFSE make no representation regarding the amount, allowance or priority of such claims and reserve all rights with respect thereto.

6. Nothing contained in this Statement should be construed as a limitation upon, or waiver of, any rights of UECFSE, AEGFSE or UCMFSE to assert, file, and/or amend any claim or proof of claim filed in accordance with applicable law and any orders entered in these cases.

7. Counsels reserve the right to amend this Statement as necessary in accordance with the requirements set forth in Bankruptcy Rule 2019.

RESPECTFULLY SUBMITTED.

In Ponce, Puerto Rico, this 30th day of May, 2018.

I HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and Standard Parties. Paper copies have been mailed pursuant to Section II of the *Fourth Amended Notice, Case Management and Administrative Procedures* (Docket No. 2839):

- (i) Chambers of the Honorable Laura Taylor Swain (two copies shall be delivered to the chambers):
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Suite No. 3212
New York, New York 10007-1312;
- (ii) Office of the United States Trustee for Region 21
Edificio Ochoa, 500 Tanca Street, Suite 301
San Juan, PR 00901-1922



/s/Rolando Emmanuelli Jiménez
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/s/Yasmín Colón Colón
USDC: 230814

/s/Jessica E. Méndez Colberg
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